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7 Attorneys for Defendants

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10 UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

11  
12 JIEMEI CHEN, ) No. C 05-0720 EDL  
13 Plaintiff, )  
14 v. )  
15 MICHAEL CHERTOFF, Secretary of the )  
Department of Homeland Security, et al., )  
16 Defendants. )  
17 \_\_\_\_\_)

SECOND STIPULATION FOR  
EXTENSION OF TIME TO RESPOND TO  
COMPLAINT AND TO CONTINUE THE  
CASE MANAGEMENT CONFERENCE;  
[PROPOSED] ORDER

18 Due to incorrect address information, there was a delay informing the beneficiaries that  
19 updated documents were necessary to process their travel documents. Because of this, the first  
20 extension was insufficient to permit the parties to resolve this matter. Once DHS Beijing  
21 receives the updated information, it will be able to issue travel documents for the beneficiaries.  
22 This action will then be moot. In order to provide the parties additional time in which to  
23 complete the steps remaining for the beneficiaries to receive their travel documents, and thus  
24 resolve the action prior to submission of defendants' answer or motion to dismiss, the parties  
25 request that the Court approve a second extension of time up to and including August 1, 2005.  
26 The parties also ask that the Court continue the case management conference from July 12, 2005  
27 to August 16, 2005, in the hopes that they can resolve the matter prior to the due date for the case  
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STIPULATION FOR EXTN OF TIME TO RESPOND TO COMPLAINT  
AND TO CONTINUE THE CMC  
C 05 0720 EDL

1 management conference statement.

2  
3 DATED: June 1, 2005

Respectfully submitted,

4 KEVIN V. RYAN  
5 United States Attorney

6 /s/ Alison E. Daw  
7 ALISON E. DAW  
8 Assistant United States Attorney

9 DATED: June 2, 2005

10 Respectfully submitted,

11 BAUGHMAN & WANG

12 /s/ Justin X. Wang  
13 JUSTIN X. WANG  
14 Attorneys for Plaintiff

**15 ORDER**

16 Pursuant to the stipulation of the parties and good cause appearing therefor, IT IS SO  
17 ORDERED.

18 DATED: June 3, 2005

